CHAPTER 1:
What is PrintSTEP & How do I Participate?

New Hampshire Department of Environmental Services (NHDES)

The New Hampshire Department of Environmental Services (NHDES) is responsible for managing and enforcing environmental regulations in the state to protect the general public and state's natural resources. Printers and all other industries in NH are regulated by the NHDES.

Every printer in NH is legally required to comply with all NHDES environmental rules and regulations.

Benefits to New Hampshire Printers

PrintSTEP is a voluntary program that offers New Hampshire printers a simplified way to manage the complex environmental regulations that typically apply to this sector. Participating printers will receive practical guidance and free technical assistance on how to improve environmental performance and comply with NH DES environmental regulations. Other benefits include:

- This simplified workbook to assist you with compliance;
- A "short-form" approach to determining environmental status and applicable requirements saving time and resources;
- Reduced administrative costs;
- Reduced chance of inspection;
- Greater operational flexibility; and
- Real environmental improvements by implementing easy pollution prevent tips.

After completing the PrintSTEP process, New Hampshire printers will have demonstrated the items necessary to be considered "in-compliance" with the NHDES regulations. Participation in PrintSTEP will also decrease the chance of a DES enforcement inspection.

Pollution Prevention Tips

In addition to assisting with environmental compliance, this workbook will introduce pollution prevention tips that will do two things: save you money and improve your environmental performance. Pollution prevention reduces waste at the source, before it is generated. Pollution prevention tips will be presented throughout the environmental compliance chapters and in Chapter 2, *Pollution Prevention for Printers.*

Introduction to PrintSTEP

PrintSTEP, which stands for "Printer's Simplified Total Environmental Partnership," is a voluntary program being pilot tested in New Hampshire as well as two additional states, Missouri and Minnesota. PrintSTEP is a program that produces a single enforceable agreement between the printer and the NHDES that covers your regulations for wastewater, storm water, hazardous waste, and air emissions. PrintSTEP does not change any of the existing environmental regulations, but it simplifies and consolidates these regulations so you can run your business in a way that is cleaner, cheaper, and smarter.

⇨ **PrintSTEP combines environmental requirements for printing facilities into one system, administered by one agency, presented in this one *Workbook*.** Chances are, you currently need to deal with different kinds of environmental permits, paperwork, or approvals to conduct your business. Working with different agencies and different forms can be confusing and time-consuming. With PrintSTEP, your wastewater, stormwater, hazardous waste, and air requirements are all covered in one package. You only have one form to submit and one environmental agency contact.

⇨ **PrintSTEP promotes pollution prevention.** Pollution prevention means changing your processes to generate less pollution, instead of treating and disposing of it after it is created. This can save you money by using fewer resources and creating less waste. Through PrintSTEP, you will have access to free technical assistance to help you find ways to prevent pollution. PrintSTEP also encourages pollution prevention by highlighting how your regulatory requirements differ depending on your facility's overall releases. The less you release, the fewer the regulatory requirements.

⇨ **PrintSTEP incorporates public involvement.** Public involvement provides an opportunity for regulatory agencies, the printer, and the community to educate each other on their concerns and interests. Under the current regulatory system, the public may not be aware of printers' contributions to their communities, or their efforts to be environmentally responsible neighbors.

⇨ **PrintSTEP provides operational flexibility.** Normally, if you are making a change to your printing operations, such as adding a press, you have to notify the NHDES; however, when you make a process change under PrintSTEP, in many cases, no notification to NHDES is required. If the change does not result in a change in your PrintSTEP regulatory status, you can often make whatever changes are needed to respond to market demands without changing the PrintSTEP agreement or notifying the DES.

PrintSTEP Program Eligibility

⇨ Facilities where printing is the primary operation are eligible to participate in the PrintSTEP program.

⇨ Facilities where printing is an ancillary operation are **not** eligible for the PrintSTEP program.

⇨ Facilities that operate printing presses, but are "quick printers" are **not** eligible for the PrintSTEP program. Printing is not considered the *primary* operation at these facilities.

⇨ If you have any questions about your eligibility contact the PrintSTEP Coordinator at (603) 271-0683 or 1 888-270-0244 within New Hampshire.

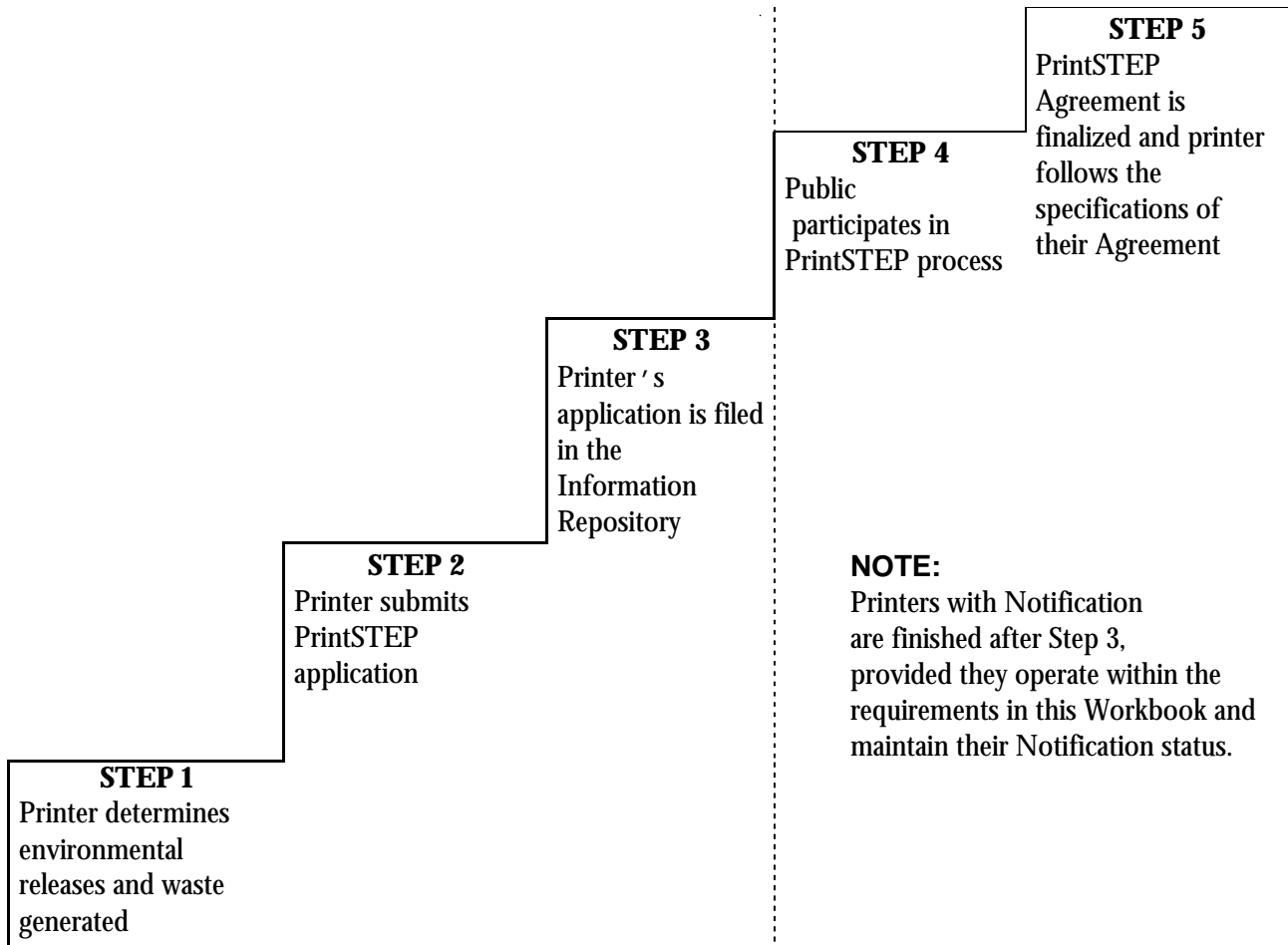## How to Become a PrintSTEP Participant

To become a PrintSTEP printer, you must first complete the enclosed PrintSTEP application. All the worksheets to prepare you for completing your application are in the chapters of this *Workbook*. The application itself is in Appendix I of this *Workbook*.

Figure 1 shows the basic process of participating in PrintSTEP. Printers who choose to participate will have their process wastewater, hazardous waste, storm water, and air requirements all covered under PrintSTEP -- there is no need to fill out multiple forms or make calls to NHDES. Read on to become a PrintSTEP printer yourself!

What You Will Need to Complete Your PrintSTEP Application

Most of the information you will need to complete the PrintSTEP application is already at your facility. This includes chemical purchasing records, material safety data sheets, and hazardous waste disposal information. MSDS sheets are provided by the manufacturer for every chemical product obtained by your vendor. You must obtain these from your vendor for each product you use. See example on Pg. 12-6. With this information and the PrintSTEP Workbook, you will be able to complete the PrintSTEP application.

Figure 1: The PrintSTEP Process

STEP 5
PrintSTEP Agreement is finalized and printer follows the specifications of their Agreement

STEP 4
Public participates in PrintSTEP process

STEP 3
Printer's application is filed in the Information Repository

STEP 2
Printer submits PrintSTEP application

NOTE:
Printers with Notification are finished after Step 3, provided they operate within the requirements in this Workbook and maintain their Notification status.

STEP 1
Printer determines environmental releases and waste generated

> **NOTE:**
> This Workbook describes the most significant regulations that typically apply to a printer's process wastewater, hazardous waste, storm water, and air emissions. However, be aware that the applicability of regulations depends on the particular processes and chemicals used in a facility. This Workbook was designed to cover the regulations for most printers, but there will occasionally be exceptions.

In PrintSTEP, Fewer Releases Mean Fewer Requirements

In PrintSTEP, your regulatory requirements depend on the quantity of emissions or wastes you generate. Fewer releases lead to fewer requirements. Those printers with the lowest releases and wastes will send in a simple PrintSTEP Notification. Printers with greater releases will get a PrintSTEP Agreement, as described below.

Most NH printers will fall into this category.

PRINTSTEP NOTIFICATION ➡

1. Your facility has a septic system and all industrial wastewater is shipped offsite *OR* You discharge less than 25,000 gpd process waste water to a POTW, *OR* you have no process waste water discharge *AND*
2. You do not generate hazardous waste *OR* you're a Small Quantity Generator *OR* you're a Full Quantity Generator (<1000 kg/month) *AND*
3. Your storm water is exempt from regulation *AND*
4. Your VOC air emission is Level 1 or 2 *AND*
5. Your RTAP Level is 1, *AND*
6. Your HAP Level is 1.

⇨ Printers with the lowest environmental releases or wastes submit a simple PrintSTEP Notification.

⇨ Document your environmental releases/wastes and submit a PrintSTEP application, which the state files in a public Information Repository.

⇨ That's it! You are a PrintSTEP participant as long as you operate within the requirements and maintain your Notification Status.

| **PRINTSTEP AGREEMENT** | ➜ | ✓ You discharge more than 25,000 gpd process waste water to a POTW, or require an individual NPDES permit *OR*
✓ You're a Full Quantity Generator of hazardous waste (>1000 kg/month) *OR*
✓ Your storm water is regulated *OR*
✓ Your VOC emissions are Level 3, 4, or 5

✓ Your RTAP Level is 2, or

✓ Your HAP Level is 2 or 3. |

⇨ Printers with greater environmental releases or wastes get a PrintSTEP Agreement, instead of a Notification.

⇨ Document your environmental releases/wastes and submit a PrintSTEP application, which the state files in a public Information Repository.

⇨ You work with the state and community to address concerns and develop the PrintSTEP Agreement which will include your regulatory requirements for process waste water, hazardous waste, storm water, and air.

⇨ When you receive your final PrintSTEP Agreement, you are then a PrintSTEP participant as long as you operate within the requirements in your Agreement.

PrintSTEP is Multi-media

PrintSTEP is a multi-media program, combining your requirements for process wastewater, stormwater, hazardous waste, and air emissions. Your regulatory requirements for each waste stream correspond to the magnitude of your releases related to that waste stream. The waste stream in the highest category determines whether you need a Notification or an Agreement, as shown in the example below.

An Example: ABC Printing Company

Waste Stream	Notification?	Agreement?
Waste water: they discharge less than 25,000 gal/day to a POTW	✓	
Hazardous waste: they are a small quantity generator	✓	
Storm water: they are exempt from storm water regulations	✓	
Air: moderate air emissions (VOC Level 3)		✓

✓ Even though ABC Printing qualifies for Notification based on 3 of the 4 waste streams, they still must apply for a PrintSTEP Agreement because of their VOC emissions. While the PrintSTEP Agreement will cover all 4 waste streams, it will list the same requirements as a Notifier would have for wastewater, hazardous waste, and storm water.

Next Step: Determining Environmental Releases

Before completing a PrintSTEP application, you must first do the following:
✓ determine your environmental releases for process wastewater, stormwater, hazardous waste, and air emissions.
✓ determine the corresponding regulatory categories.
✓ determine your corresponding regulatory requirements for each waste stream.

Chapters 2-9 will guide you through this process.

Public Involvement

Under PrintSTEP, each environmental release will determine the amount of public participation involved with the process. ***Most printers will only require a PrintSTEP Notification where public participation will only include storing your Notification in a local Information Repository.***

Public Involvement Requirements Worksheet

check your status in each row	**NO Public Involvement**	**LIMITED Public Involvement**	**FULL Public Involvement**

Waste Water	POTW discharges of <25,000 gal/day
	  POTW, no discharges
	  Septic System, no discharges
		POTW discharges of >25,000 gal/day	NPDES Individual permit

Storm Water	NPDES General permit "No-Exposure"		

Hazardous Waste	no hazardous waste gen.
	  Small Quantity Generator
	  Full Quantity Generator, less than 1000 kg/month
		Full Quantity Generator, more than 1000 kg/month	

Air Emissions, VOC	VOC Level 1 VOC Level 2	VOC Level 3	VOC Level 4 VOC Level 5
Air Emissions, RTAP	RTAP Level 1	RTAP Level 2	